

THE HONORABLE KAREN A. OVERSTREET

Chapter 11

Hearing Date: October 1, 2010

Hearing Location: Seattle

Hearing Time: 9:30 am

Response Date: September 29, 2010

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re:

TACO DEL MAR FRANCHISING CORP.,

Debtor.

CONRAD & BARRY INVESTMENTS,
INC.

Debtor.

No. 10-10528

RESPONSE TO MOTION FOR AN ORDER
APPROVING THE ASSUMPTION AND
ASSIGNMENT AND REJECTION OF
EXECUTORY CONTRACTS AND
UNEXPIRED LEASES AND
ESTABLISHING CURE AMOUNTS

COMES NOW Northland Restaurant Group, Inc. ("Northland"), a creditor in the present proceeding, by and through its local counsel, and in response to the motion of the Debtors for an order approving the assumption and assignment and rejection of executory contracts, states as follows.

Through its attorney Mark Western, Northland contacted the Law Offices of Jeffrey B. Wells on the afternoon of September 29, 2010, the response date for the above motion. Northland requested that the Law Offices of Jeffrey Wells sponsor its attorney Mark Western, who is admitted to practice law in North Dakota, to appear pro hoc vice in the present proceeding, and to otherwise assist it in objecting to the Debtors' motion. Our office has prepared a motion, declaration, and order in support of Mark Western's pro hoc vice appearance which are awaiting signature before they are submitted.

RESPONSE - 1

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Law Offices
JEFFREY B. WELLS

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1 With the assistance of Mark Western, Northland has prepared a limited response to the
2 present motion, which is attached hereto as Exhibit A and incorporated by reference. Our office will
3 review the response and, if we decide it needs to be supplemented, will file a brief response
4 tomorrow.

5 Wherefore, Northland requests that the Court deny the motion of the Debtors to reject its
6 Master Development Agreement.

7 DATED this 29th day of September, 2010.

8 Law Offices of Jeffrey B. Wells

9 /s/ Emily Jarvis

10 By: Emily Jarvis, WSBA #41841

11 Attorney for Northland Restaurant Group, Inc.